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Hearing Date: February 18, 2011
Objection Deadline: February 11, 2011

*Attorneys for Ohio Bureau of Workers'
Compensation*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

DPH HOLDINGS CORP., et al.,

Reorganized Debtors.

Case No. 05-44481 (RDD)

Chapter 11

Jointly Administered

**NOTICE OF MOTION OF OHIO BUREAU OF WORKERS' COMPENSATION TO (I)
DEEM CLAIM TIMELY FILED, OR, ALTERNATIVELY, (II) AUTHORIZE THE
AMENDMENT OF CLAIM, OR (III) PERMIT LATE FILED CLAIM**

PLEASE TAKE NOTICE that upon the accompanying motion (the "Motion") and all other pleadings and proceedings herein, Ohio Bureau of Workers' Compensation ("BWC"), by its undersigned counsel, moves this Court before the Honorable Robert D. Drain, United States Bankruptcy Judge, United States Bankruptcy Court, 300 Quarropas Street, White Plains, New York 10601, on February 18, 2011 at 10:00 a.m. or such other date and time as soon thereafter as the Court may direct, for an Order deeming claim number 1294 (the "Claim") a timely filed administrative expense claim, or, alternatively, permitting BWC to amend its timely filed Claim to classify such Claim as an administrative expense claim, or permitting BWC to file a late administrative expense claim.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, must be filed with the Court and served upon the undersigned counsel no later than February 11, 2011 at 4:00 p.m. (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that responses and objections, if any, to the Motion and the relief requested therein must be made in writing, conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the United States Bankruptcy Court, Southern District of New York (the "Bankruptcy Court"), and be filed with the Bankruptcy Court electronically in accordance with General Order M-242 (a copy of General Order M-242 and the User's Manual for the Electronic Case Filing System may be found at www.nysb.uscourts.gov, the Bankruptcy Court's official website), by registered users of the Bankruptcy Court's case filing system and, by all other parties in interest, on one 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect or any other Windows-based word processing format and must be served in accordance with General Order M-242, with a courtesy copy delivered to the Chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, and served on Baker & Hostetler LLP, 45 Rockefeller Plaza, New York, New York 10111 (Attn: Marc Skapof), so as to be received no later than the Objection Deadline.

Dated: New York, New York
January 24, 2011

Respectfully submitted,

BAKER & HOSTETLER LLP

By: /s/ Marc Skapof
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